Final, Revision 1

Environmental Condition of Property East Stuart Mesa, Camp Pendleton & Quantico Housing Phase VI (Camp Pendleton 6)

Marine Corps Base Camp Pendleton San Diego, California

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EXECUTIVE SUMMARY

This Environmental Condition of Property (ECP) report has been prepared by ChaduxTt for the Department of the Navy (DON), Naval Facilities Engineering Command Southwest (NAVFAC SW). This ECP has been prepared for the proposed Camp Pendleton & Quantico Housing (CPQH) at the former East Stuart Mesa agriculture lease (ESM) ("subject property") located on the Marine Corps Base Camp Pendleton (MCBCP). The ESM, which is located on the southwestern portion of MCBCP, includes 376 acres and is planned to be developed in multiple phases of the Public Private Venture (PPV) lease transaction; CPQH Phase VI (Camp Pendleton 6) housing will be the first phase of development. The purpose of the ECP is to describe the current and past environmental condition of the 376 acre ESM parcel, which includes the CPQH Phase VI (Camp Pendleton 6) development, with respect to the presence of hazardous substances and petroleum product contamination.

This ECP will be used to evaluate the suitability of the subject property for lease with primary concern for human health and the environment, and to provide a snapshot of the site condition of the leased property at the time of the real estate transaction. Per DON's policy (DON 2006b), the ECP may be used to document inquiry into environmental conditions to support real estate decisions, protect the DON from future liability, assess the risk of exposure to lessees, or to inform lessees of environmental conditions, restrictions, and land use controls associated with the property. Based on the results of this evaluation, the ECP concludes that the properties are suitable for residential development under the PPV, with the following conditions identified during preparation of the ECP:

- Historically, the subject property has been used for the production of agriculture (most recently as a tomato farm). The use of pesticides to manage crop growth was identified as a condition of environmental concern. Environmental impacts to agricultural properties are typically associated with pesticide, herbicide, and fumigant use and are often identified in areas of storage, mixing, distribution, and application. DON conducted a preliminary screening of soils throughout the subject property for legacy pesticides beginning in April 2008 (Trevet 2009a). The results of the pesticide sampling indicated elevated levels of toxaphene and dieldrin contamination. Based on the results of the sampling activities conducted by Shaw, a Human Health Risk Assessment (HHRA) was prepared by Parsons (2009) to assess the potential risks to future human receptors. The HHRA determined that the residential regional screening level (RSL) of 440 µg/kg for toxaphene and the remedial goal of 24 µg/kg for dieldrin, which was calculated based on U.S. Environmental Protection Agency (EPA) toxicity data, were protective of human health. To determine the extent of contamination, Apex Companies, LLC collected discrete soil samples within the initial phase of the proposed PPV Phase VI of the ESM CPQH development (Camp Pendleton 6) in September 2008 at the request of the PPV (Trevet 2009b). The analytical results of the soil samples indicated levels of toxaphene that were greater than the residential RSL. Therefore, with third-party oversight provided by the Regional Water Quality Control Board (Water Board), DON

conducted a voluntary remediation of the contaminated soils within the footprint of PPV Phase VI at the ESM CPQH development by excavating impacted soils to a depth of up to 4 feet below ground surface (bgs) in the area of the former storage shed on the east side of the subject property. Post excavation confirmation soil samples were collected from the bottom of the excavation. Toxaphene and dieldrin results were less than the RSLs in the confirmation samples. The Water Board reviewed the "Final Closure Report" prepared by Insight Environmental, Engineering and Construction, Inc. (Insight). On August 27, 2009, the Water Board issued a letter of the intent to close the ESM CPQH Phase VI (Camp Pendleton 6) site (Appendix H). MCBCP requested concurrence from the Water Board to leave pesticide-contaminated soil in-place in the utility corridors associated with the proposed Phase VI of the CPQH development (Appendix H). The Water Board concurred with the proposal with the following conditions: (a) establish an alternate cleanup level, (b) implement land use controls, (c) conduct soil sampling, and (d) provide best management practices (Appendix H). The real estate lease shall include a covenant to address any Land Use Controls instituted by DON as a result of the voluntary pesticide cleanup.

- Although not identified in site development maps or interviews with the owner, the potential exists that asbestos concrete pipe (transite) may have historically been used for irrigation systems with agricultural operations at East Stuart Mesa. Similar piping was found at the Wire Mountain housing area located north of Vandegrift Boulevard. These pipes are typically buried at shallow depths and, if present, will require removal, which should be performed by asbestos trained professionals, and disposal at a Class II landfill during site development operations.

MCBCP also provided applicable information for the subject property and are cited as appropriate in the ECP.

DON contracted Shaw Environmental and Infrastructure, Inc. (Shaw) to perform a preliminary screening for pesticides in soil at the subject property, which was conducted in April, June, and September 2008. The initial findings from the pesticide sampling indicated elevated levels of toxaphene and dieldrin, legacy contaminates, in the surface soils. Toxaphene results ranged from 110 to 5,200 micrograms per kilogram (µg/kg), and dieldrin results ranged from 2 to 90 µg/kg. A site assessment report detailing the soil sampling conducted by Shaw was prepared by Trevet (2009a). Based on the sample results, it was recommended that pesticide contaminated soil in the proposed ESM CPQH development be excavated before construction of the housing project begins.

A Human Health Risk Assessment (HHRA) was performed by Parsons (2009) based on the results of the sampling activities conducted by Shaw in 2008 of the entire 376 acre ESM agriculture fields. The HHRA determined that exposure to toxaphene and dieldrin could result in a risk greater than $1x10^{-6}$. The residential regional screening level (RSL) of 440 µg/kg for toxaphene and the remedial goal of 24 µg/kg for dieldrin, which was calculated based on U.S. Environmental Protection Agency (EPA) toxicity data, were determined to be protective of human health. Of the 371 surface soil samples collected by Shaw in 2008 in the 376 acres of the ESM CPQH, results for 288 samples were above the toxaphene RSL, and results of 88 samples were above the dieldrin remedial goal.

In September 2008, APEX Companies, LLC (APEX) collected soil samples within the revised footprint of PPV Phase VI (Camp Pendleton 6), which will be the first phase to be developed at the ESM CPQH. From those samples, it was determined that approximately 7 to 10 acres of soil in the PPV Phase VI footprint were contaminated with toxaphene and would require remediation. Therefore, a remediation work plan was prepared by Trevet (2009b) in preparation of the voluntary remediation of pesticide contaminated soils in the revised footprint of PPV Phase VI to be conducted by DON. Phase VI (Camp Pendleton 6) will be located on approximately 50 acres in the central eastern area of the ESM CPQH. The work plan detailed the excavation of approximately 7 to 10 acres of toxaphene-impacted soil in the footprint of Phase VI and the collection of confirmation samples in the post-excavated areas.

A Closure Report dated August 24, 2009 was prepared by Insight Environmental, Engineering and Construction, Inc. (Insight) and describes the results from the soil excavation activities conducted in PPV Phase VI of the ESM CPQH (Insight 2009). In order to delineate areas of elevated toxaphene and dieldrin concentrations to be excavated, pre-excavation sampling was conducted by Insight between May 4 and 20, 2009. The pre-excavation sample results estimated approximately 32,700 tons of soil from 36 quarter-acre grids within the proposed PPV Phase VI footprint would require excavation to a depth of 2 feet bgs. The actual quantity of impacted soil removed from the site to meet the project objectives was 37,205 tons to a depth of 1.33 to 3.5 feet bgs. Confirmation soil samples were collected from the floor of the excavation and analyzed by EMAX Laboratories for analysis of pesticides by EPA Method 8081A. The first round of confirmation samples indicated that toxaphene and dieldrin concentrations were below the respective remedial goals in 75 percent of the samples. Additional soil was excavated in the area where contamination remained. The depth of the second round of excavation ranged

from 4 inches to 1 foot below the surface of the previous excavation. Additional confirmation samples were collected after each round of excavation. Supplementary excavation was required to obtain toxaphene and dieldrin results below their respective remedial goals in several areas. The majority of the contaminated soil removed from the footprint of Phase VI was transported off Base for disposal, and the remainder of the contaminated soil was utilized for a toxaphene treatability study that is currently being performed in the northern portion of the ESM agriculture field (SDV Engineering & Construction, JV 2009). Based on the Closure Report, the Water Board found that corrective actions were performed in accordance with the work plan and will place a notice of intent to close PPV Phase VI in the agenda of the next Water Board meeting (Appendix H).

A memorandum was prepared (date unknown) by Sharon Jones, NAVFAC SW Natural Resource Specialist. The memorandum detailed the condition of the subject property, the events that occurred with regard to the closure of the agriculture lease, the Phase I Environmental Assessment Report, and a letter from the lessee requesting the release of the Lessee's bond (Appendix G). On July 15, 2008, the lessee (Harry Singh and Sons) was notified of the lease expiration date (December 31, 2008); the lessee was notified of the expected removal and restoration obligations of the lease on November 15, 2008. A Phase I Environmental Assessment was conducted on February 4, 2009 by Mr. Bryan Osborn and Mr. Al Augusto, MCBCP AC/S Environmental Security. At the time of the site assessment, the lessee was finalizing the clean-up of the subject property. With the exception of a concrete slab with a drain, all storage sheds and the aboveground storage tanks (AST) used to store fuel had been removed from the subject property. However, a rusted 55 gallon drum was found in the southern laydown area, but this area is adjacent to the subject property. On March 27, 2009, the lessee requested the release of the Lessee's bond after all structures, including irrigation lines, ASTs, and buildings, had been removed from the subject property.

2.4 REAL ESTATE DOCUMENT REVIEW

The subject property was under lease to Harry Singh and Sons for agriculture purposes until December 31, 2008, at which time the farm equipment and supplies were removed from the subject property. The proposed PPV lease will be used to construct multi-family homes, community facilities, and related infrastructure.

Through interviews with NAVFAC SW Real Estate personnel (Appendix F – T. Phelps interview), it was determined that the subject property has been owned by the U.S. Marine Corps since the base opened in 1942. Before 1942, the area was part of the Rancho Santa Margarita y Las Flores land holdings. The nearest easement to the subject property is the natural gas line and the Atchison, Topeka and Santa Fe Railway (AT&SF), both of which adjoin the western boundary of the subject property (Appendix B2 – Photograph No. 3 and 4).

MCBCP currently has a Utility Use Agreement with San Diego Gas and Electric (SDG&E); therefore, utility lines are present along the east side of the subject property.

Based on the agricultural operations that occurred at the ESM agricultural lease for the last 67 years, NAVFAC SW collected preliminary soil samples in April, June, and September 2008 to verify whether contamination exists on the subject property. Toxaphene and dieldrin were detected at concentrations above remediation goals. The results of this sampling event are discussed in more detail in Section 5.8. In preparation of PPV Phase VI, approximately 37,000 tons of pesticide contaminated soil was excavated from the central eastern portion of the subject property and disposed off-site.

A review of available historical aerial photographs (1946, 1953, 1963, 1974, 1990, 1994, 2002, and 2005) (EDR 2009b) and historical topographic maps (1901, 1904, 1947, 1949, 1950, 1968 1975 and 1997) (EDR 2009c) of the subject property was conducted as part of this ECP. Copies of the aerial photographs and detailed descriptions of the review findings are provided in Appendix C, and copies of the topographic maps are provided in Appendix E.

From review of the historical aerial photographs, the subject property appears to be undeveloped and graded for agricultural use in the 1946 aerial photograph. In Figure 3-1, a historical land use map based on the 1963 aerial photograph, a structure (possibly the original farm house for the Singh family) is present near the northeastern boundary of the subject property, and several structures are located near the southern boundary of the subject property below the cultivated land (possibly additional housing for farm helpers or equipment storage area). Although these structures exist on the early aerial photographs, they are surrounded by land graded for agricultural use. In addition, these structures are no longer visible on the 1974 to current aerial photographs (Appendix C).

An archives review of *Records of the United States Marine Corps, Facilities and Services Real Estate* was conducted by ChaduxTt staff in April 2008 in the Washington D.C. area. A map was found during the archives review presenting the parcel numbers for the agricultural out leases on MCBCP. According to this map, the subject property would be located in Parcel 10.

A communication dated July 8, 1957, from the Commanding General, Headquarters MCBCP, to the Commandant of the Marine Corps regarding the "Renegotiation of Agricultural Out leases at Marine Corps Base, Camp Pendleton, California" was also discovered during the archives review. This communication indicated that one tenant had short-term exploitive tendencies. The tenant was forced to vacate the property, but during his tenure the land had deteriorated to a point of reduced rental value. The Commanding General stated that he had not been able to ascertain which parcel was referenced or the nature of the damage. Therefore, no evidence was found indicating the exploited parcel is part of the subject property.

3.2.2 Current Operations and Land Use

The subject property is currently vacant (no structures exist) with the exception of soil sampling and clean-up methods being conducted (SDV Engineering & Construction, JV 2009). Harry Singh and Sons leased the subject property until December 31, 2008, at which time the property was transferred back to MCBCP.

5.0 ENVIRONMENTAL CONDITIONS

This section describes the environmental condition of the subject property with respect to hazardous substances, petroleum products, solid waste, pesticides, munitions, radon, natural and cultural resources, and other environmental concerns. It also identifies data gaps and provides recommendations for actions necessary to protect human health and the environment before effecting any proposed real property transactions. A checklist, notes, and site photographs taken during the visual site inspections are included in Appendix B.

During the visual site inspection conducted on April 4, 2008, the subject property was being farmed with tomatoes and appeared in overall good condition, with no visual evidence of stained soils, no stressed vegetation, no pools of liquid or residue, no discarded containers, and no abandoned structures or tanks. Review of available documents and historical aerial photographs and interviews (Appendix F – Russ Mosier) indicate that the subject property has been used as a tomato farm since 1942. However, during the second visual site inspection in August 2009, all farm equipment and supplies had been removed from the subject property.

5.1 HAZARDOUS SUBSTANCE/WASTE MANAGEMENT

Based on the previous agricultural use of the subject property, NAVFAC SW conducted soil sampling for analysis of pesticides in April, June, and September 2008. The initial findings from the pesticide sampling indicated the presence of elevated levels of toxaphene and dieldrin in the surface soils. According to the information provided by Ms. Theresa Morley, NAVFAC SW Remedial Project Manager, the majority of the toxaphene contamination is located in the northern section of subject property; however, the southern section contains toxaphene concentrations at levels above the remediation goals. The pesticide contamination is discussed in more detail in Section 5.8 below.

During the April 2008 visual site inspection, ASTs containing diesel and a used oil drum within a concrete secondary containment and a building used to store fertilizer were observed on the east side of the subject property (Appendix B2 – Photograph No. 10-13). However, these structures and the ASTs had been removed before the August 2009 visual site inspection.

On June 12, 2008, ChaduxTt requested a records review from the County of San Diego, Department of Environmental Health (DEH) to determine if a Hazardous Materials Permit or Underground Storage Tank files existed for the subject property. On June 20, ChaduxTt received notice from the DEH that no records were found for the ESM site.

5.2 PETROLEUM CONTAMINATION

No evidence of the disposal or release of petroleum products was found on the subject property during site inspections, records review and preparation of this ECP.

SDG&E, no testing has been conducted to date at or around the substation, and no testing is proposed. However, the substation has a concrete secondary containment wall, and no known releases have occurred at the substation. According to the Senior Environmental Counsel for SDG&E, the responsibility for maintaining the substation was transferred from MCBCP to SDG&E (Appendix F – Gonzales Interview). No evidence of peeling, flaking, or chipped paint was observed during the site inspection.

5.8 PESTICIDES, HERBICIDES, AND SOIL FUMIGANTS

The subject property has been used to cultivate tomatoes since the 1940s. Pesticide and fertilizers were used during farming on the subject property since it was used for agriculture, as is evident from the visual site inspection, historical aerial photographs, and interviews. Pesticides and fertilizers are reported to have been applied in accordance with the California Department of Pesticide Regulation and the Pest Management Section of MCBCP's Facility Maintenance Department (FMD). The primary compounds of concern based on past operations are typically residual concentrations of organo-chlorine pesticides and herbicides, along with associated metals (typically arsenic). These compounds may be found in areas of past or current storage areas used for mixing or loading distribution systems, as well as the fields where they were applied.

During the April 2008 visual site inspection, one fertilizer storage shed and four water/fertilizer pump stations were observed on the subject property (Appendix B2 – Photograph No. 9 and 10). The pump stations were used to pump water and fertilizer to the tomato plants. The fertilizer storage shed and the four pumps were removed in March 2009 by Harry Singh & Sons (Appendix G); which was visually confirmed during the August 2009 site inspection (Appendix B1 – Photograph No. 2 and 4-7). The soil around where the former pump stations and storage shed were located was free of debris, and there was no visual evidence of soil staining observed.

A list of pesticides and fertilizers that were used by the farmer and stored on-site was obtained during the interview with the Harry Singh and Sons head farmer (Appendix F – K. Singh Interview). The list of the soil fumigants, fertilizers, and pesticides used and stored at the former ESM agricultural lease is presented in Table 5-1. The pesticides were applied consistent with agricultural use, and no other hazardous materials or wastes were identified.

Based on the agricultural activities and past operations that have occurred at the subject property, the presence of pesticides was an environmental concern. Therefore, DON contracted Shaw to conduct a preliminary screening of soil for pesticides on the subject property. The initial findings from the pesticide sampling, which was conducted in April, June, and September 2008, indicated elevated concentrations of toxaphene and dieldrin in surface soils. Toxaphene concentrations ranged from 110 to 5,200 µg/kg. The remedial goal for toxaphene is 440 µg/kg. Of the 371 surface soil samples collected within the 376 acres that are the ESM CPQH development, results for 288 were above the residential RSL for toxaphene. Dieldrin concentrations ranged from 2 to 90 µg/kg. A total of 88 dieldrin samples exceeded the residential RSL of 30 µg/kg. According to the site assessment report (Trevet 2009a), the

toxaphene and dieldrin contamination is located primarily in the surface soil; however, toxaphene contamination is also present in the deeper soil in some areas of the subject property.

A HHRA was performed by Parsons (2009) based on the results of the sampling activities conducted by Shaw in 2008 of the entire 376 acre ESM CPQH development. The HHRA determined that exposure to toxaphene and dieldrin could result in a risk greater than 1x10-6. The residential RSL of 440 µg/kg for toxaphene and the remedial goal of 24 µg/kg for dieldrin, which was calculated based on U.S. Environmental Protection Agency (EPA) toxicity data, were determined to be protective of human health in the HHRA.

APEX collected soil samples within the revised footprint of PPV Phase VI (Camp Pendleton 6), which will be the first phase to be developed at the ESM CPQH, in September 2008. APEX determined that approximately 7 to 10 acres of soil in the PPV Phase VI footprint were contaminated with toxaphene and dieldrin and would require remediation.

Based on the "Final Remediation Work Plan" prepared by Trevet (2009b) for the excavation of pesticide contaminated soils at the East Stuart Mesa agriculture fields, DON conducted a voluntary remediation of soils in the revised footprint of PPV Phase VI between May and July 2009 (Insight 2009). According to the Closure Report dated August 24, 2009, approximately 37,000 tons of pesticide-impacted soil was excavated from the PPV Phase VI footprint to a depth of 1 to 3.5 feet bgs. Confirmation soil samples were collected from the floor of the excavation and analyzed by EMAX Laboratories for analysis of pesticides by EPA Method 8081A. Based on the results of the confirmation samples Supplementary excavation was required to obtain toxaphene and dieldrin results below their respective remedial goals in several areas. Additional confirmation samples were collected after each round of excavation.

The Water Board reviewed the "Final Closure Report" and found that corrective actions were performed in accordance with the work plan (Trevet 2009b) and will place a notice of intent to close PPV Phase VI in the agenda of the next Water Board meeting (Appendix H). On September 16, 2009, the Water Board was contacted by Camp Pendleton representative Tracy Sahagun requesting agreement to leave pesticide-contaminated soil in-place in the utility corridors associated with the proposed Phase VI of the ESM CPQH development. Waste characterization that was conducted on stockpile samples to determine the leachability determined that no future impact to groundwater was expected. On September 25, 2009, the Water Board concurred with the proposal with the following conditions (Appendix H):

- The Marine Corp will be required to establish an alternate cleanup level;
- LUCs will be implemented within the utility corridor;
- Conduct soil sampling during the installation of sewer lines and grading activities;
- Provide best management practices during trenching, utility installation, and grading activities.

paint was used. No documentation was found to indicate that the house has been evaluated for lead-based paint.

The following are issues that were identified on the subject property that indicate the presence of environmental conditions of concern:

- Historical use of the subject property for agricultural production and the use of chemicals to manage crop growth were identified as a condition of possible environmental concern. Environmental impacts to agricultural properties are typically associated with pesticide, herbicide and fumigant use and are often identified in areas of storage, mixing, distribution, and application. DON conducted a preliminary screening of soil in the fields for pesticides beginning in April 2008 at the subject property (Trevet 2009a). The results of the pesticide sampling indicated elevated levels of toxaphene and, to a lesser extent, dieldrin contamination in the surface soils. Therefore, an HHRA was performed by Parsons (2009), which determined that exposure to toxaphene and dieldrin could result in a risk greater than $1x10^{-6}$. To further determine the extent of contamination, Apex collected discrete soil samples within the proposed PPV Phase VI (Camp Pendleton 6) of the ESM CPQH development in September 2008. The soil sample analytical results indicated levels of toxaphene were greater than the residential RSL of 440 µg/kg in the Phase VI footprint. Therefore, a "Final Remediation Work Plan" was prepared (Trevet 2009b) to detail the voluntary remediation of the impacted soils within the footprint of PPV Phase VI, which will be the first phase of development at the ESM CPQH. According to the "Final Closure Report" dated August 24, 2009, approximately 37,000 tons of soil were removed from the Phase VI footprint (Insight 2009). Post excavation confirmation soil samples were collected, and toxaphene results were less than the residential RSL. The Water Board reviewed the "Final Closure Report" prepared by Insight and on August 27, 2009, issued a letter of intent to close Phase VI of the ESM CPQH (Appendix H). MCBCP requested concurrence from the Water Board to leave pesticide-contaminated soil in-place in the utility corridors associated with the proposed Phase VI of the CPQH development (Appendix H). The Water Board concurred with the proposal with the following conditions: (a) establish an alternate cleanup level, (b) implement LUCs, (c) conduct soil sampling, and (d) provide best management practices (Appendix H). Before residential development, each phase of the PPV should be evaluated to determine the extent of pesticide contamination. In addition, developers should take extreme caution not to contaminate the remediated area of PPV Phase VI with soil from the areas of the former ESM agriculture field that have not been remediated during the construction process. The real estate lease shall include a covenant to address any LUCs instituted by DON as a result of the voluntary pesticide cleanup.

Site 1116, 14 Area GW – The site was recently transferred from the UST program to CERCLA. A PA/SI is necessary, but is not funded until 2009.

Site 1117, 15/16 Area GW – The site was recently transferred from the UST program to CERCLA. A PA/SI is necessary, but is not funded until 2012.

Site 1118, Area 21/26/52 GW – The site was recently transferred from the UST program to CERCLA. A PA/SI is necessary, but is not funded until 2012.

A4: Ms. Morley stated the following via email on July 3rd: "Site 1E-1 was closed NFA with the OU4 ROD. All of the contaminated soil at Site 30 has been removed and we are backfilling next week. There were about 90 drum fragments in one grid of Site 1D. The drum fragments and the soil contained pesticides, fuels, paint and solvents. The drum fragments and soil have been removed and we are now pumping out the groundwater at the site for disposal."

(August 5, 2009 via email)

Q5: Has this IR Site 30 been closed?

A5: A Remedial Action Completion Report is being written for this site.

Q6: Has IR Site 1D been closed?

A6: No, the groundwater needs to be remediated.

Q7: IR Site 7 is located approximately 1 mile southeast of the East Stuart Mesa site. Based on your experience with this site, do you think that vapor intrusion will be an issue with the East Stuart Mesa site?

A7: Absolutely not, it isn't even an issue with the housing that's 150 feet from it.

Q8: We received a very hand colored map indicating the levels of toxaphene and dieldrin from the sampling that was conducted by Parsons in 2008. Has a Draft or Final version of that report been completed?

A8: There was no report of the sampling done by Shaw, but the maps were put together of the data by GeoMorphis (maps were attached to email).

Q9: During the voluntary soil removal at the site, was there any indication of a diesel or gasoline spill in the area where the aboveground storage tanks were located?

A9: I asked the operator and he said they did not see or smell anything at the site that indicated a fuel spill.

Q10: When was the Phase VI excavation conducted at the subject property?